

## REMARKS

Reconsideration and allowance of the claims are requested.

Claim 12 has been amended to avoid the §112 rejection in paragraphs 4-6.

Claims 27 and 30 overcome the §102(e) rejection by specifically differentiating the present cured polymer layer from the friction enhancing layer of Higgins, as suggested by the examiner in paragraph 15 of the office action.

Claim 27, for example, points out the two supply sources 21 and 22 and the carpet web forming unit 9 for coating the back side of the semi-finished product with the front side of the felt backing, and forming a carpet web. Those features are not found in Higgins '410. The examiner may be referring to Higgins '276 which was cited in the first office action.

Claim 27 further points out an application unit 15 for applying a curable styrene butadiene latex layer and a curing unit 16 for curing that layer and imparting dimensional stabilization and rigidity, which is not found in Higgins '410.

Claim 27 also points out the punching unit 17 for punching the carpet web with the cured styrene butadiene latex layer, which is not found in Higgins '410.

Claim 30 points out the carpet square with a coating of cured latex polymer dimensional stabilization and rigidity layer. That cured latex polymer dimensional stabilization and rigidity layer is not found in Higgins '410.

Higgins' coating 180 enhances lateral grip but is not latex polymer and does not impart stabilization and rigidity to the carpet square.

The subject matter of claims 12-26, 28, 29 and 31-35 would not have been obvious from a combination of Higgins '410, '406, '672 and '994.

Claim 12, for example, points out the steps of:

forming an outermost layer by coating the rear side of the felt with a coating of curable latex polymer, curing the curable latex polymer and providing dimensional stabilization and rigidity to the carpet web before punching and providing carpet shapes with the dimensional stabilization and rigidity imparting cured layer of latex polymer on the rear side.

None of those features are apparent in any of the four references.

Claims 13-26 depend from claim 12 and have the same features of claim 12 that are not found in the four Higgins references.

Claim 14 points out the forming of the outermost layer and the semi-finished carpet pile product partially or fully with the same material.

Claim 15 adds to claims 12 and 14 that the same material is polymer.

Claim 16 adds to claim 12 that the curable latex polymer is a thermo-hardening water-based styrene butadiene latex polymer.

Claim 20 adds to claim 12 that the curing is at a temperature between 60° and 160 °C.

Claim 21 adds to claim 20 that the curing of the curable latex polymer is at about 100 °C.

Claim 25 adds to claim 12 that the curable latex polymer is an aqueous solution having a dry matter percentage of 51.1% of modified styrene butadiene latex polymer.

Claim 26 adds to claim 25 that the curable latex polymer is between 50g and 100g of dry matter per m<sup>2</sup>.

Claim 33 adds to claim 30 that the cured latex polymer layer is in an amount of 50g to 100g dry matter per m<sup>2</sup>.

Claim 34 adds to claim 30 that the amount of cured latex polymer is less than 100g of dry matter per m<sup>2</sup>.

Claim 35 points out, for example, an application unit surface coating layer on the rear side of the felt backing with curable styrene butadiene latex polymer and curing the polymer for imparting dimensional stability and rigidity before punching.

These features are not found in the four Higgins references.

The invention is new and unobvious. New and unobvious features of the invention are specifically set forth in the claims.

### **CONCLUSION**

Reconsideration and allowance are requested.

Respectfully,

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